

RMT/AAS:ICR/JEA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

SAMANTHA SHADER,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ELAINE SILADI, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

Causing Damage by Fire and Explosives – Police Vehicle

On or about May 30, 2020, within the Eastern District of New York, the defendant SAMANTHA SHADER did knowingly, intentionally and maliciously damage, and attempt to damage and destroy, by means of fire and one or more explosives, a vehicle and other real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a New York City Police Department vehicle in Brooklyn, New York.

(Title 18, United States Code, Section 844(i))

AMENDED COMPLAINT
AND AFFIDAVIT IN
SUPPORT

(18 U.S.C. § 844(i))

No. 20-M-402

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Joint Terrorism Task Force ("JTTF"). I have been an agent for approximately twelve years. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical and electronic surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information regarding a variety of crimes. I am familiar with the facts and circumstances set forth below from my personal review of records, documents and other physical evidence obtained during this investigation, and from communications and information provided to me by fellow agents and other government personnel with knowledge related to this investigation.

2. On or about May 29, 2020 at approximately 11:00 p.m., an individual, later identified as the defendant SAMANTHA SHADER, approached a New York City Police Department ("NYPD") vehicle parked in the vicinity of Eastern Parkway and Washington Avenue in Crown Heights, Brooklyn.² A video provided to law enforcement

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² On May 30, 2020, your Affiant submitted a Complaint and Affidavit in Support of Application for Arrest Warrant to the Honorable Sanket J. Bulsara, U.S. Magistrate Judge for the Eastern District of New York, in United States v. Samantha Shader, No. 20-MJ-402 (E.D.N.Y. May 30, 2020). That Affidavit incorrectly stated that SAMANTHA SHADER approached the NYPD vehicle "[o]n or about May 30, 2020 at approximately 1:12 a.m." (See Compl. ¶ 2). This was an error, and the correct approximate date and time that SAMANTHA SHADER approached the NYPD vehicle and was later apprehended is reflected in this Affidavit.

from a witness captured the events. The video initially shows the defendant SHADER light an incendiary device – specifically, a bottle containing an incendiary chemical (sometimes referred to as a “Molotov cocktail” device) – while an unidentified male attempts to shield SHADER from onlookers. SHADER thereafter throws the Molotov cocktail at the NYPD vehicle, which was occupied by four NYPD officers. The Molotov cocktail shattered two windows of the NYPD vehicle on impact and caused internal damage to the NYPD vehicle. An image of the defendant Shader throwing the Molotov cocktail is shown below and the video provided by the witness is appended by reference.

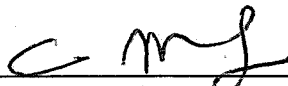


3. After observing SHADER throw the Molotov cocktail, officers in the NYPD vehicle pursued after SHADER while she attempted to flee. The same officers then apprehended SHADER and placed her under arrest.

4. Following her arrest, SHADER waived her Miranda rights both verbally and in writing. In sum and substance, SHADER admitted to possessing the Molotov cocktail and throwing it at the NYPD vehicle.


5. The NYPD vehicle is the property of the NYPD and the New York City government. Both the NYPD and New York City government conduct business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the NYPD and the New York City government in enacting and enforcing laws also affect interstate commerce.

WHEREFORE, your deponent respectfully requests that the defendant SAMANTHA SHADER, be dealt with according to law.



ELAINE SILADI
Special Agent, Federal Bureau of Investigation

Sworn to before me this
1st day of June, 2020



THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK